

**Law Office of Mohammed Gangat**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 8/3/2023

**August 2, 2023**

via ECF

Hon. Judge Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street,  
New York, NY 10007

**RE: *Alexander et. al. v. Global Threat Solutions, LLC,*  
No. 1:23-cv-01891-AT**

To the Honorable Judge Torres:

I represent plaintiffs, Carlos Alexander, Vivian Perrin, and Matthew Tyson (the "Plaintiffs") in the above action. I submit this letter to request an extension of time.

On June 28, 2023, the parties attended a mediation conference, resulting in a settlement resolving all claims in this case. On July 5, 2023, Your Honor ordered the parties to submit their settlement papers for approval in accordance with *Cheeks v. Freeport Pancake House, Inc.*, by August 2, 2023. I now request a two week extension of that deadline to August 16, 2023.

The parties have agreed on the form and contents of a written settlement agreement and are in the process of getting it signed.

No previous requests to extend the deadline have been made.

I had anticipated that the parties would be able to get their agreement signed and a Cheeks letter approved by the close of business today. As the hour is late, and that did not happen, I have not had an opportunity to discuss this request with defense counsel. We did, however, exchange emails concerning getting the agreement signed earlier this week. Accordingly, I assume defense counsel would consent to this request which seeks only an additional 14 days to submit the agreement for Cheeks approval.

As always, I thank this Court for its time and consideration.

Respectfully submitted,  
/s/ Mohammed Gangat  
Mohammed Gangat, Esq.

GRANTED.

SO ORDERED.

Dated: August 3, 2023  
New York, New York

  
\_\_\_\_\_  
ANALISA TORRES  
United States District Judge